

1 MELINDA HAAG (CABN 132612)  
2 United States Attorney

3 MIRANDA KANE (CABN 150630)  
4 Chief, Criminal Division

5 RANDY LUSKEY (CABN 240915)  
6 Assistant United States Attorney

7 1301 Clay Street, Suite 340S  
8 Oakland, CA 94612  
9 Telephone: (510) 637-3680  
10 Fax: (510) 637-3724  
11 E-Mail: randall.luskey@usdoj.gov

12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,	)	No. cr 12-00582 YGR
17 Plaintiff,	)	
18 v.	)	[PROPOSED] ORDER AND
19 MILTON GAMEZ FIERRO,	)	STIPULATION FOR CONTINUANCE
20 Defendant.	)	FROM SEPTEMBER 20, 2012 TO
	)	OCTOBER 25, 2012 AND EXCLUDING
	)	TIME FROM THE SPEEDY TRIAL ACT
	)	CALCULATION (18 U.S.C. §
	)	3161(h)(8)(A))

21 On September 7, 2012, at the request of both parties, the Court set a date of September  
22 20, 2012 for an entry of plea for defendant Milton FIERRO. Due to unforeseen developments that  
23 will require additional investigation prior to any change of plea, the parties now jointly request  
24 that the entry of plea be continued until October 25, 2012 at 2:00 p.m. After discussions between  
25 the government and defense counsel, defendant FIERRO now believes it is in his best interests to  
26 postpone the entry of plea to October 25, 2012 in order to afford him additional time to  
27 investigate the case. With the agreement and consent of FIERRO and the government, the Court

28 JOINT STIPULATION AND [PROPOSED] ORDER CONTINUING PLEA

1 enters this order scheduling an entry of plea on October 25, 2012 at 2:00 p.m. and documenting  
2 the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(b), from September 20, 2012  
3 to October 25, 2012 as to defendant FIERRO.

4  
5 IT IS SO STIPULATED:

6  
7 DATED: September 18, 2012

/s  
\_\_\_\_\_  
DAVID ANDERSEN  
Attorney for Defendant

8  
9  
10 DATED: September 18, 2012

/s  
\_\_\_\_\_  
RANDY S. LUSKEY  
Assistant United States Attorney

11  
12  
13 IT IS SO ORDERED.

14 DATED: September 19, 2012

  
\_\_\_\_\_  
HON. YVONNE GONZALEZ ROGERS  
United States District Court Judge